

REMARKS

Applicants request favorable reconsideration and withdrawal of the rejection set forth in the above-noted Office Action in view of the foregoing amendments and following remarks.

Initially, Applicants note that Information Disclosure Statements were filed on November 21, 2006, and September 29, 2006, in the present application. Applicants have not yet received copies of the PTO-1449 forms attached to these Information Disclosure Statements to indicate that the Examiner has considered the references cited therein and that the references have been officially made of record. Accordingly, it is requested that the next Official communication include copies of the PTO-1449 forms.

Applicants further note that a copy of the PTO-1449 form that was included with the Information Disclosure Statement filed on September 14, 2006, was attached to the July 17, 2007 Office Action. The references cited on this copy of the PTO-1449 form, however, were not marked as considered by the Examiner. Accordingly, Applicants request the next Official communication include a copy of this PTO-1449 form indicating consideration of the cited references by the Examiner.

Claims 1, 2, 5-8, 10-13, 16-19, and 21-23 remain pending, with claims 1, 12, 16, 17, 21, and 22 being independent. Claims 1, 5, 12, 16, 17, 21, and 22 have been amended. Claim 23 has been newly added. Support for the amendments and new claim can be found throughout the originally-filed disclosure, including, for example, at paragraphs 0059-0064 of the specification. Thus, Applicants submit that the amendments and new claim do not include new matter.

Claims 1, 2, 5-13, 16-19, 21, and 22 are rejected in the Office Action under 35 U.S.C. § 103(a) as being unpatentable over Levine et al. (U.S. Patent No. 5,477,038) in view of Shimizu et al. (U.S. Patent No. 5,898,158) and Applicants' disclosed art (“AAPA”).

Applicants respectfully traverse the rejection. Nevertheless, without conceding the propriety of the rejection and solely to expedite prosecution, independent claims 1, 12, 16, 17, 21, and 22 have been amended to clarify certain features of the invention not suggested by the cited references. To this end, Applicants submit that the claims are patentably distinguishable from the cited references for at least the following reasons.

Independent claim 1 has been amended to recite a method including, inter alia, a step of processing information via a pre-established Travelers Cheque infrastructure and transmitting the processed information to a non-Travelers Cheque transaction account infrastructure.

Independent claims 12, 16, 17, and 22 have also been analogously amended to include aspects of a pre-established Travelers Cheque transaction account infrastructure and a non-Travelers Cheque transaction infrastructure. Independent claim 21 has been amended to recite a system including, inter alia, a distributor system configured to communicate with a transaction account issuing system via at least one of a plurality of pre-established financial infrastructures, wherein at least one of said plurality of pre-established financial infrastructures comprises a pre-paid card infrastructure.

The Office Action cites Levine et al. as disclosing a method and corresponding system that includes features of the claimed invention. The Office Action acknowledges, however, that Levine et al. does not disclose receiving information via MICR protocol or a pre-existing Travelers Cheque infrastructure. In order to cure this deficiency, the Office Action cites the art disclosed in the present application (AAPA) as disclosing that the use of MICR protocol or pre-existing Travelers Cheque infrastructure to receive information from a distributor regarding a sale of a Travelers Cheque is old and well known. The Office Action concludes that it would have been obvious to one of ordinary skill in the art to modify the teachings of Levine et al. to

use credit or bank cards as alternatives to the reference's disclosed prepaid cards in order to increase flexibility of Levine et al.'s method and system.

Applicants respectfully submit, however, that Levine et al. fails to disclose or suggest any form of relationship between a Travelers Cheque infrastructure and a non-Travelers Cheque infrastructure. Levine et al. is directed to a pre-paid card system having cards associated with a bank identification number and an account number, whereby a customer can access funds from a pre-paid account to withdraw currency. Levine et al. further discloses, in Figure 4, an ETC processor 66 connected to a VisaNet network 82. However, both the ETC processor and the VisaNet network are Travelers Cheque infrastructures. Levine et al. thus fails to appreciate the complexity and convenience associated with establishing a relationship between a Travelers Cheque infrastructure and a non-Travelers Cheque infrastructure, as in Applicants' invention. Such a relationship, as found in Applicants' invention, can provide expansive benefits, by allowing widespread financial access for smaller and more proprietary financial infrastructures, and creating a synergy between a world-wide Travelers Cheque financial network and these smaller infrastructures and providing, for example, synchronized inventory management and customer information. In contrast, Levine et al. is limited to funds stored/accessible on the VisaNet system, and fails to provide these integrated features. Also, while Levine et al. is limited to currency transactions, Applicants' invention can also enable global access to non-currency accounts, such as specific rewards or retailer points, calling card or cellular telephone minutes, or other values unrelated to currency.

Levine et al. also fails to disclose or suggest a plurality of pre-established financial infrastructures, wherein at least one of said plurality of pre-established financial infrastructures comprises a pre-paid card infrastructure, as recited in amended claim 21. Indeed, Levine et al.

merely discloses the distributor system communicating via a *single* pre-established financial infrastructure (ETC processor 66), as shown in Fig. 4. On the other hand, Applicants' invention provides multiple pre-established financial infrastructures, at least one of which comprises a pre-paid card infrastructure. This configuration can allow improved versatility for the pre-paid card infrastructure, by providing multiple points of access to the pre-paid card infrastructure, either directly by a distributor having a relationship with the pre-paid card infrastructure, or alternatively via at least a second pre-established financial infrastructure (e.g. Travelers Cheque infrastructure) of the plurality of pre-established financial infrastructures. This approach can enable an issuer of pre-paid cards to maintain its existing "direct" infrastructure and not limit its access to distributors via an intermediary "middle-man" financial infrastructure, thereby subjecting itself to a particular commission-based sales approach.

Applicants further submit that Shimizu et al. fails to cure the deficiencies of Levine et al. Shimizu et al. is cited in the Office Action as teaching the use of a credit card or bank card in place of a prepaid card. However, Shimizu et al. fails to disclose any relationship between a Travelers Cheque infrastructure and a non-Travelers Cheque infrastructure.

Applicants further submit that the art disclosed in the present application (AAPA) fails to cure the deficiencies of Levine et al. and Shimizu et al. As previously mentioned, AAPA is cited in the Office Action as allegedly disclosing that the use of MICR protocol or pre-existing Travelers Cheque infrastructure to receive information from a distributor regarding a sale of a Travelers Cheque is old and well known. However, AAPA likewise fails to disclose any relationship between a Travelers Cheque infrastructure and a non-Travelers Cheque infrastructure.

For at least the foregoing reasons, Applicants submit the invention recited in the independent claims of the present application is patentable over the combination of Levine et al., Shimizu et al., and Applicants' disclosed art.

The dependent claims should also be deemed allowable for defining features of the invention in addition to those recited in their respective independent claims. Favorable individual consideration of the dependent claims is requested.

Applicants submit that the present application is in condition for allowance. Favorable reconsideration, withdrawal of the rejection set forth in the Office Action, and a Notice of Allowability are requested.

Applicants' undersigned attorney may be reached in our Washington, D.C. Office by telephone at (202) 530-1010. All correspondence should continue to be directed to our address listed below.

Respectfully submitted,

/Donald H. Heckenberg, Jr./

Donald H. Heckenberg, Jr.
Attorney for Applicants
Registration No. 60,081

FITZPATRICK, CELLA, HARPER & SCINTO
30 Rockefeller Plaza
New York, New York 10112-3801
Facsimile: (212) 218-2200

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